## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA **GREENVILLE DIVISION**

GEORGE D. METZ, II	) ) C/A No. 8:23-cv-01159-DCC-KFM
Plaintiff,	) )
v.	
CITY OF EASLEY, SOUTH CAROLINA,	)
Defendant.	)
	)
	)

# DEFENDANT, CITY OF EASLEY'S, MOTION TO AMEND ITS ANSWER AND **DEFENSES TO THE PLAINTIFF'S COMPLAINT**

#### TO: PLAINTIFF NAMED ABOVE:

PLEASE TAKE NOTICE that the Defendant, by and through its undersigned counsel, will move before this Court, at a time and place to be designated by the Court, but no sooner than ten (10) days after the service hereof, for an Order granting the Defendant leave to amend its Answer pursuant to Rule 15, of the Federal Rules of Civil Procedure. Plaintiff seeks to amend its Answer to add an additional defense of mootness or lack of case or controversy based upon the Defendant's adoption of revisions to the challenged ordinance in this case. Attached hereto as Exhibit "A" is Defendant's proposed Amended Answer.

I hereby certify that this Motion is meritorious and not intended merely for delay.

### **DUGGAN & HUGHES, LLC**

/s/ Daniel R. Hughes

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Entry Number 75

Counsel for Defendant, City of Easley

### **CERTIFICATE OF SERVICE**

This is to certify that I have on this day filed electronically via CM/ECF a true and correct copy of the foregoing MOTION TO AMEND DEFENDANT'S ANSWER AND DEFENSES in the United States District Court for the District of South Carolina. Furthermore, I have served the Plaintiff, a pro se litigant, by regular and certified mail at the address below, and therefore, I have served all the parties in this case in accordance with the directives from the Court Notice of Electronic Filing ("NEF") which was generated as a result of the electronic filing:

George D. Metz, II 4980 SE 140<sup>th</sup> St. Summerfield, FL 34491

This 12th day of March 2025.

/s/ Daniel R. Hughes
Daniel R. Hughes